

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

DONALD J. TRUMP FOR PRESIDENT,	) CIVIL ACTION
INC.; et al.,	)
	)
Plaintiffs,	)
	)
v.	) No. 2:20-CV-966
	)
KATHY BOOCKVAR; et al.,	)
	)
Defendants.	) JUDGE NICHOLAS RANJAN

**STIPULATION**

Plaintiffs and the undersigned County Election Board, by their undersigned counsel, hereby stipulate as follows:

1. The undersigned County Election Board desires a prompt resolution of this case in order to have direction on how to properly proceed in the upcoming November 2020 General Election. Accordingly, while the undersigned County Election Board neither admits nor denies the allegations of the Verified Amended Complaint, the undersigned County Election Board withdraws any pending Rule 12 motion and stipulates and agrees to not contest the declaratory and injunctive relief requested by Plaintiffs in this action. Also, the undersigned County Election Board stipulates and agrees to abide by whatever decisions the Court in this action and/or the General Assembly make regarding the upcoming General Election.

2. Plaintiffs acknowledge that the undersigned County Election Board has answered and responded to the written interrogatories and document requests served upon it by Plaintiffs on July 24, 2020, and that the undersigned County Election Board has produced or will be producing to Plaintiffs' counsel by August 14, 2020, those non-privileged items and documents requested by such written discovery.

3. In exchange for the undersigned County Election Board's stipulation and cooperation in discovery as stated in the other paragraphs of this Stipulation, Plaintiffs stipulate and agree to forego any claim for attorneys' fees and costs against only the undersigned County Election Board and agree not to enter default or seek any further response from the undersigned County Election Board in this case.

4. To the extent the deposition testimony or other sworn statement of the undersigned County Election Board shall be reasonably necessary for evidentiary purposes, Plaintiffs and the undersigned County Election Board stipulate and agree to reasonably cooperate with each other to provide such testimony or statement in the least burdensome manner.

Respectfully submitted,

PORTER WRIGHT MORRIS & ARTHUR LLP

Dated: August 10, 2020

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GREENE COUNTY BOARD OF ELECTIONS

Dated: August 10, 2020

By: /s/ ROBERT EUGENE GRIMM  
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**CERTIFICATE OF SERVICE**

I, Robert Eugene Grimm, Esquire, hereby certify that true and correct copies of the foregoing STIPULATION has been served this 13<sup>th</sup> day of August 2020 by electronic mail to:

*All Counsel of Record*

Respectfully Submitted,

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